

**Before the United States District Court for the Northern District of Ohio
Western Division at Toledo**

The United States of America
Plaintiff

v.

Shanice Hodge
Defendant

)
) **Case No. 3:23-cr-00054-JRK**
)
) **Judge James R. Knepp**
)
) **Unopposed Motion to Modify Terms**
) **of Bond**

Comes now, the Defense, on behalf of Shanice Hodge, requesting the Court's consideration for a modification to the bond conditions currently governing Ms. Hodge, i.e. the removal of her ankle monitor.

Ms. Hodge has shown great strides in adhering to all conditions of her release so far, thus demonstrating her commitment to the processes and conditions established by this Court. Recently, she has obtained employment in the service industry, specifically with a dining establishment. This employment opportunity stands as a positive development in her personal and professional growth, while also offering a beneficial contribution to her local community.

However, the ankle monitoring device currently a requirement of her bond conditions, creates a hindrance in the context of her new work environment. The physical demands and public-facing nature of her job make the device not only a potential impediment but also a possible source of undue stigma and embarrassment.

Recognizing the importance of Ms. Hodge's compliance with court-imposed conditions, the defense conferred with the U.S. Attorney's office regarding this matter.

They have expressed no objection to the removal of the ankle monitoring device.

In light of these circumstances, we respectfully request the Court to consider a modification to Ms. Hodge's bond conditions, specifically, the removal of the ankle monitoring device requirement. We believe this modification will enable her to fully participate in her new work environment while continuing to uphold the conditions of her release.

Respectfully Submitted,

s/ Rhys Cartwright-Jones

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For Shanice Hodge

Proof of Service: All parties to this matter receive ECF service, and I sent a copy of this paper to them through this Court's ECF application on the date of filing.

s/ Rhys Cartwright-Jones

Rhys Brendan Cartwright-Jones, 0078597